

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

MURRAY C. TURKA, on Behalf of)	Civil Action No. 2:19-cv-1102-RMG
Himself and All Others Similarly Situated,)	
)	
Plaintiff,)	
)	
v.)	
)	
SOUTH CAROLINA PUBLIC SERVICE)	
AUTHORITY and LONNIE N. CARTER,)	
)	
Defendants.)	
)	
)	

**LEAD PLAINTIFF'S UNOPPOSED MOTION FOR AN ORDER PRELIMINARILY
APPROVING CLASS ACTION SETTLEMENT AND AUTHORIZING
DISSEMINATION OF NOTICE OF SETTLEMENT**

Lead Plaintiff Murray C. Turka ("Lead Plaintiff") hereby moves the Court for an order preliminarily approving the settlement of the above-captioned class action and authorizing the dissemination of notice of the settlement (the "Settlement"). The grounds for this motion are as follows:

1. The Settlement warrants preliminary approval because of the significant benefit achieved for the settlement class, the substantial costs and risks that would otherwise be associated with continued prosecution of the Action, and the fact that the proposed Settlement is the result of arm's-length negotiations by experienced counsel overseen by an experienced mediator.
2. The Settlement meets all the requirements of Rule 23(e) of Federal Rules of Civil Procedure.
3. The Notice Plan outlined in the Settlement meets all the requirements of due process and adequately informs class members of all material details of the Settlement, including:

the amount of the Settlement; a statement concerning the issues about which the Parties disagree; states the amount of attorneys' fees and litigation expenses that Lead Counsel will seek; provides the name, mailing address, email address, and telephone number of counsel, who will be available to answer questions from Class Members; all relevant deadlines to object to any part of the Settlement or to opt-out of the Settlement; and provides a brief statement explaining the reasons why the Parties are proposing the Settlement.

4. Lead Counsel has met and conferred with attorneys for Defendants who do not oppose the relief sought in the Motion.

This Motion is supported by Lead Plaintiff's accompanying Memorandum and Points of Authority in support filed contemporaneously herewith, as well as relevant accompanying exhibits.

Dated: January 25, 2021

HOPKINS LAW FIRM, LLC

/s/ William E. Hopkins, Jr.

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